

From: Sara Goldberg
To: "Daniel W. Pisani"
Cc: "C. Sanders McNew"; "James K. Schultz"
Subject: RE: ADT v. Elephant Group
Date: Monday, April 28, 2014 4:59:00 PM

Yes, I have that document which is entitled "Addendum One to Paramount Media Group." The first paragraph states that the addendum amends the Affiliate Agreement dated 10/12/10 between Paramount and Saveology. Could you send me the Affiliate Agreement?

Thank you.

Sara

From: Daniel W. Pisani [mailto:dpisani@sessions-law.biz]
Sent: Friday, April 25, 2014 6:14 PM
To: 'Sara Goldberg'
Cc: 'C. Sanders McNew'; James K. Schultz
Subject: RE: ADT v. Elephant Group

Sara,

Can you send me a copy of the redacted agreement to which refer? I know there was an agreement filed by ADT in support of a previous motion (Dkt. 179-1) but that document does not appear redacted.

I will contact Elephant Group about the verification form and the 30(b)(6) representative and will follow up with you early next week. I believe Ms. Fernandes will be the 30(b)(6) rep., but I need to confirm.

Dan



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From: Sara Goldberg [mailto:sara@saragoldberglaw.com]
Sent: Friday, April 25, 2014 1:11 PM
To: Daniel W. Pisani; James K. Schultz
Cc: 'C. Sanders McNew'
Subject: ADT v. Elephant Group

Dan,

A few questions for you:

- Could you send me complete and unredacted copies of the agreements between Saveology and Paramount? The agreements that were previously produced by Elephant Group are partial and/or redacted. Or, if I have missed them amongst all the papers, please send me the Bates numbers of the complete and unredacted agreements.
- I don't have a signature or verification to Elephant Group's answers to ADT's interrogatories. Could you please forward that as well.
- Finally, please let me know whether Daphne Fernandes will be serving as the 30(b)(6) witness or whether another person(s) will be testifying.

Thank you.

Sara

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